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5 Attorney for Defendant,  
CSAA GENERAL INSURANCE COMPANY

6 **UNITED STATES DISTRICT COURT**

7 **DISTRICT COURT OF NEVADA**

8 **JONI LeGALLEY, an individual,**

2:17-CV-01232-JAD-VCF

9 Plaintiff,

10 v.

11 **CSAA GENERAL INSURANCE COMPANY**  
12 **a Foreign Entity aka AAA NEVADA**  
13 **INSURANCE COMPANY aka AAA**  
14 **INSURANCE; AMERICAN AUTOMOBILE**  
15 **ASSOCIATION OF NORTHERN**  
16 **CALIFORNIA, NEVADA & UTAH, aka**  
17 **AAA NEVADA INSURANCE COMPANY**  
18 **AAA INSURANCE; a Foreign**  
19 **Entity; and ROES I through X,**

20 Defendants.

21 **AMENDED STIPULATION AND ORDER TO EXTEND DISCOVERY DEADLINES**

22 **(THIRD REQUEST)**

23 IT IS HEREBY STIPULATED AND AGREED by Plaintiff, JONI  
24 LeGALLEY, and Defendant, CSAA GENERAL INSURANCE COMPANY a  
Foreign Entity aka AAA NEVADA INSURANCE COMPANY aka AAA  
INSURANCE, hereinafter CSAA GENERAL INSURANCE COMPANY to Extend  
Discovery Deadlines by sixty days.

**A. STATEMENT SPECIFYING THE DISCOVERY COMPLETED:**

1. Plaintiff's initial disclosures pursuant to FRCP 26;
2. Defendant American Automobile Association of Northern  
California, Nevada & Utah disclosures pursuant to FRCP  
26;
3. Defendant CSAA General Insurance Company a foreign entity  
disclosures pursuant to FRCP 26;
4. Plaintiff's Request for Production of Documents to  
American Automobile Association of Northern California,  
Nevada & Utah;
5. Defendant American Automobile Association of Northern  
California, Nevada & Utah Response to Plaintiff's Request  
for Production of Documents;
6. Defendant American Automobile Association of Northern  
California, Nevada & Utah First Supplemental Response to  
Plaintiff's Request for Production of Documents;
7. Plaintiff's Request for Production of Documents to CSAA  
General Insurance Company;
8. Defendant CSAA General Insurance Company Response to  
Plaintiff's Request for Production of Documents;
9. Plaintiff's first supplemental disclosures pursuant to  
FRCP 26;
10. Defendant CSAA General Insurance Company a foreign  
entity first supplemental disclosures pursuant to FRCP  
26;

11. Defendant CSAA General Insurance Company a foreign entity second supplemental disclosures pursuant to FRCP 26;
12. Plaintiff's Responses to Defendant, CSAA's Request for Admissions;
13. Plaintiff's Responses to Defendant, CSAA's Interrogatories;
14. Plaintiff's Responses to Defendant, CSAA's Request for Production of Documents;
15. Plaintiff's Expert Witness Disclosures;
16. Defendant's Designation of Expert Witnesses and Documents;
17. Defendant's First Supplemental Designation of Expert Witnesses and Documents;
18. Defendant CSAA General Insurance Company a foreign entity third supplemental disclosures pursuant to FRCP 26;
19. Deposition of Joni LeGalley;
20. Deposition of Louis Mortillaro, PhD;
21. Deposition of Richard Cestkowski, D.O.;
22. Deposition of Ryan Grabow, M.D.;
23. Deposition of William Muir, M.D.;
24. Deposition of Brian Ogg;
25. Notice of Deposition of Brett Wolff;
26. Notice of Deposition of Person Most Knowledgeable of

1 CSAA;

2 27. Notice of Deposition of Heather Howell;

3 **B. A SPECIFIC DESCRIPTION OF THE DISCOVERY THAT REMAINS TO BE**  
4 **COMPLETED:**

5 Plaintiff intends to take the deposition of at least two  
6 additional adjusters, as well as the deposition of the personal  
7 most knowledgeable of CSAA that is currently on calendar but  
8 being moved due to a calendar conflict with Defense counsel and  
9 CSAA. Defendant intends to depose Mr. Gellner. Both parties  
10 intend to take additional expert witness depositions. Further,  
11 after the depositions have been conducted, additional discovery  
12 may need to be completed.

13 **C. REASONS WHY DISCOVERY HAS NOT BEEN COMPLETED WITHIN**  
14 **THE TIME LIMITS SET BY THE DISCOVERY ORDER.**

15 Both parties have been working diligently to complete  
16 discovery in a timely manner. However, parties have been having  
17 trouble getting dates that work with all parties and witnesses  
18 schedules.

19 Further, Plaintiff's counsel was in and out of state for a  
20 trial throughout February, March, and April. Scheduling witness  
21 depositions has proved challenging, but the remaining  
22 depositions have been put on calendar.

23 The parties believe that a sixty day extension will allow  
24 both parties to complete all remaining depositions.

**D. PROPOSED SCHEDULE FOR COMPLETING DISCOVERY:**

The parties have agreed to the following modified deadlines:

Discovery Cut off:	04/19/2018	06/18/2018
Expert Disclosure:	11/20/2017	CLOSED
Rebuttal of Experts:	12/20/2018	05/18/2018
Interim Status Report:	11/20/2017	CLOSED
Dispositive Motions:	05/21/2018	07/18/2018
Pre Trial Order:	06/20/2018	08/17/2018

**F. SAID REQUEST IS NOT BEING MADE FOR PURPOSES OF UNDULY DELAYING DISCOVERY OR THE TRIAL OF THIS MATTER.**

Dated: April 19<sup>th</sup>, 2018

Dated: April 19<sup>th</sup>, 2018

RANALLI ZANIEL FOWLER & MORAN, LLC

MINCIN LAW, PLLC

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 Attorney for Plaintiff


If dispositive motions are filed, the deadline for filing the joint pretrial order will be suspended until 30 days after decision on the dispositive motions or further court order.

**ORDER**

IT IS SO ORDERED:

4-20-2018

Dated: \_\_\_\_\_



UNITED STATES MAGISTRATE JUDGE